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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In Re: Case No. 25-10088 WJL

Kingsborough Atlas Tree Surgery, Inc. Chapter 11

Debtor.

NOTICE OF MOTION FOR AUTHORITY
TO SELL PERSONAL PROPERTY
OPPORTUNITY TO OBJECT
OPPORTUNITY TO OVERBID

Kingsborough Atlas Tree Surgery, Inc. ("Debtor") has filed a Motion for Authority to Sell Personal Property pursuant to 11USC § 363(b) wherein Debtor is requesting authority to sell a 2021 Vermeer HG6800TX Horizontal GRINDER w/Dolly, to National Waste Management at the sale price of \$575,000, all cash. The sale is with the consent of Commercial Credit Group ("CCG") that holds a valid and perfected security interest in the Horizontal Grinder. The proceeds of sale are to be paid to CCG. Debtor believes the sale of the equipment Debtor no longer needs will result in lowering Debtor's operating expenses while paying down Debtor's obligation to Commercial Credit Group and is therefore in the best interest of the estate.

OPPORTUNITY FOR HEARING

Notice of the Sale is given pursuant to B.L.R. Section 9014-1(b)(3), which provides that unless otherwise ordered, a party in interest may, in certain situations, initiate a request for relief without setting a hearing by giving notice that a request for relief governed by B.L.R. 9014-1(b)(3) shall be accompanied by a Notice and Opportunity for Hearing.

1. Any objection to the requested relief, or a request for hearing on the matter, must

1 be filed and served upon the initiating party within 21 days of mailing of the notice;

2 2. A request for hearing or objection must be accompanied by any declarations or
3 memoranda of law the party objecting or requesting wishes to present in support of its position;

4 3. If there is no timely objection to the requested relief or a request for hearing, the
5 court may enter an order granting the relief by default;

6 4. If there is a timely objection to the requested relief or a request for hearing, a
7 hearing will be held on not less than 10 days notice to the party requesting the hearing, the
8 Office of the United States Trustee, and parties who have filed a notice of appearance. The
9 hearing will be held in the in the courtroom of the Honorable William Lafferty, 1300 Clay Street,
10 Room 220, Oakland, CA 94612. Parties may participate in the hearing by video conference. The
11 procedure for appearing by Tele/Video Conference can be found at www.canb.uscourts.gov.
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13 OPPORTUNITY TO OVERBID'

14 The sale is subject to overbid. The minimum initial overbid will be in the amount of
15 \$600,000. Any person wishing to overbid must deliver to counsel for the Debtor, no later than
16 5:00 p.m. on Monday, June 9, 2025, a written offer to purchase the equipment for at least the
17 initial-overbid amount on the same terms, all cash, and must qualify by delivering to counsel for
18 the Debtor a cashier's's check in the amount of \$60,000 as a good faith deposit.

19 If there is at least one overbid, an auction sale will be conducted via telephone at 10:00
20 am on June 11, 2025. A conference call-in number will be provided by counsel for the Debtor.
21 Hoskins.

22 Bidding will be opened at the amount offered by the first party submitting an overbid and
23 will continue in increments of \$10,000 until no further bids remain. Good faith deposits by
24 unsuccessful bidders will be returned at the conclusion of the bidding. The successful bidder
25 will be required to close the sale within fifteen days of the entry of the order approving the sale.
26

27 Dated: May 21, 2025

/s/ Michael C. Fallon

Michael C. Fallon

Attorney for Debtor